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Attorneys for Defendant

GOOGLE LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JOHN DOE I, et al., individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:23-cv-02431-VC
(Consol. w/ 3:23-cv-02343-VC)

**DECLARATION OF EDUARDO
SANTACANA IN SUPPORT OF
JOINT ADMINISTRATIVE MOTION
TO CLOSE THE COURTROOM AT
THE MARCH 22, 2024 FURTHER
CASE MANAGEMENT CONFERENCE**

Date: March 22, 2024

Time: 10:00 a.m.

District Judge Vince Chhabria
San Francisco Courthouse, Ctrm. 4

I, Eduardo Santacana, declare as follows:

1. I am an attorney licensed to practice in the State of California. I am an attorney with the law firm of Willkie Farr & Gallagher LLP, counsel of record for Google LLC (“Google”) in the above-captioned matter. I have knowledge of the facts set forth below and, if called as a witness in a court of law, could and would testify competently thereto.
2. On March 8, 2024, Google filed an Unopposed Administrative Motion to Seal the Joint Letter Brief and Han Declaration re: Preservation (Dkt. 117) (“Motion to Seal”), as well as the Han Declaration and Santacana Declaration in support.
3. For the reasons articulated in the Motion to Seal, Google moves to close the Courtroom during the March 22, 2024 Further Case Management Conference (“Motion to Close the Courtroom”) to the extent the Court anticipates discussing the substance of the Parties’ Joint Letter Brief re: Preservation (Dkt. 116).
4. Counsel for the Parties met and conferred via telephone and e-mail on March 20, 2024. During these conversations, Plaintiffs’ counsel advised that they join in the Motion to Close the Courtroom for the March 22, 2024 Further Case Management Conference.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: March 20, 2024

By: /s/ Eduardo Santacana
Eduardo E. Santacana
Attorney for Google LLC